

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-35 are pending in the application, with 1, 9, 19-21, 25, 29, 33, and 34 being the independent claims. Claims 1, 19, 21, 28, 29, and 33 are amended to more clearly recite the claimed subject matter. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

In paragraph 4 of page 2 of the Office Action, claims 1-11, 13, 14, 17, and 19-35 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,226,300 to Hush et al. (hereinafter Hush). Applicants respectfully traverse the rejection, and request that it be withdrawn.

Hush does not teach each and every feature of claim 1. For example, Hush does not disclose engaging in a binary traversal operation with a reader, as recited in claim 1. Hush does not disclose the bit-for-bit exchange that occurs during a binary traversal. Instead, in Hush, the interrogator transmits multi-bit masks to devices during interrogations, which the devices evaluate before responding.

Applicants respectfully point out inaccuracies in the characterization of Hush provided in the Office Action. For example, on page 2-3, the Office Action states:

As shown in FIG. 4, the devices and interrogator work in bit-by-bit manner in selecting designated RFID tag (col. 6, lines 7+; col. 6, lines 21+). For example, when the first bit is 1, then only the tags with the first bit of 1 respond. This process is iterated to the next bit until the last bit, and the tag is identified.

This is incorrect. FIG. 4 of Hush shows an arbitration scheme where “the interrogator 26 sends a command causing each device 12 . . . to select a random number from a known range and use it as that device’s arbitration number” (col. 6, lines 7-12). Each oval in FIG. 4 encloses an arbitration value (AVALUE), which are shown as 4-bit values in the example of FIG. 4. At the right of each level of the tree shown in FIG. 4 is an arbitration mask value (AMASK), which are shown as 4-bit values in the example of FIG. 4. During each interrogation of Hush, the “interrogator sends an arbitration value (AVALUE) and an arbitration value (AMASK) to the set of devices 12” (col. 6, lines 27-29). Thus, in the example of FIG. 4, the interrogator would send 8 bits to the devices 12 (4 bits of AVALUE and 4 bits of AMASK). Before responding, each device 12 evaluates the following equation: $(AMASK \& AVALUE) == (AMASK \& RV)$, where “&” is a bitwise AND function, “==” is an equality function, and RV is a random value ID generated in each device 12. If the equation evaluates to “1” (TRUE), then the particular device 12 will reply. If the equation evaluates to “0” (FALSE), then the particular device 12 will not reply. See col. 6, lines 11-38. Thus, FIG. 4 of Hush does not describe communicating in a “bit-by-bit manner,” as alleged in the Office Action.

Instead, in Hush, the interrogator transmits multiple, multi-bit masks that each device 12 evaluates before responding. In light of this, it is clear that Hush does not

describe a bit-for-bit exchange, and thus does not disclose a binary traversal algorithm.

Therefore, Hush does not disclose engaging in a binary traversal operation with a reader, as recited in claim 1, and does not teach each and every element of claim 1.

Accordingly, Applicants respectfully submit that independent claim 1 is patentable over Hush, for at least these reasons. Independent claims 9, 19-21, 25, 29, 33, and 34 are patentable over Hush for similar reasons, and further in view of their own features. Furthermore, claims 2-8, which depend from independent claim 1, claims 10, 11, 13, 14, and 17, which depend from independent claim 9, claims 22-24, which depend from independent claim 21, claims 26-28, which depend from independent claim 25, claims 30-32, which depend from independent claim 29, and claim 35, which depends from independent claim 34, are also patentable over Hush for at least these reasons, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of these claims be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 103

In paragraph 7 of page 4 of the Office Action, claim 12 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Hush in view of U.S. Patent No. 6,412,086 to Friedman et al. (hereinafter Friedman). In paragraph 8 of page 4 of the Office Action, claims 15, 16, and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hush in view of U.S. Patent No. 6,397,334 to Chainer et al. (hereinafter Chainer).

Applicants respectfully traverse the rejection, and request that it be withdrawn.

As described above, Applicants assert that independent claim 9 is patentable over Hush. Applicants assert that Friedman and Chainer do not remedy the deficiencies of

Hush with respect to claim 9. Applicants assert that claims 12, 15, 16, and 18, which depend from claim 9, are also patentable over Hush for at least the reasons described above with respect to claim 9, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 12, 15, 16, and 18 be reconsidered and withdrawn.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

A handwritten signature in black ink, appearing to read "J. S. Weaver", followed by a horizontal line.

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